

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No. 1:18-CR-00043
	:	
Plaintiff,	:	Judge Timothy S. Black
	:	
vs.	:	
	:	DEFENDANT'S REQUEST FOR
YANJUN XU,	:	PRETRIAL DISCLOSURE OF 404(b)
	:	EVIDENCE OF OTHER CRIMES,
Defendant.	:	WRONGS, OR ACTS

Pursuant to Federal Rule of Evidence 404(b), Defendant Yanjun Xu, by and through counsel, hereby requests the United States Attorney to provide counsel pretrial disclosure of evidence of other crimes, wrongs, or acts as set forth in that rule.

Respectfully submitted,

/s/ Ralph W. Kohnen

Ralph W. Kohnen (0034418)

Jeanne M. Cors (0070660)

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COUNSEL FOR DEFENDANT

MEMORANDUM

Defendant Yanjun Xu, respectfully requests pretrial disclosure of evidence of other crimes, wrongs, or acts pursuant to Rule 404(b) of the Federal Rules of Evidence.

Respectfully submitted,

/s/ Ralph W. Kohnen

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2019 a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties in this case by operation of the Court's CM/ECF system. Parties may access this filing through the Court's system.

/s/ Ralph W. Kohnen